

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. _____
v. : DATE FILED: _____
JEFFREY TOLL : VIOLATION: 18 U.S.C. § 513(a)
(Uttering counterfeit securities - 1 Count)

I N F O R M A T I O N

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. At all times material to this information, defendant JEFFREY TOLL resided in Huntingdon Valley, Pennsylvania and operated under business names, including "Sidewalksaver.com, LLC."
2. At all times material to this information, PNC Bank was an organization that maintained offices in the Eastern District of Pennsylvania and operated in, and had activities affecting, interstate commerce.
3. At all times material to this information, Acme Market, Inc. ("Acme"), Superfresh Supermarkets ("Superfresh"), and Genuardi Family Markets, Inc. (Genuardi's) operated grocery stores in the Eastern District of Pennsylvania and elsewhere and were organizations operating in, and have activities affecting, interstate commerce.
4. In or about June, 2000, defendant JEFFREY TOLL opened checking account no. 86-1527-2789 in the name of "Sidewalksaver.com, LLC" at PNC Bank.
5. Between in and around August, 2000, and in and around January, 2001, defendant JEFFREY TOLL presented counterfeit PNC checks and checks written on fictitious

PNC accounts for negotiation at Acme, Genuardi's and Superfresh grocery stores. The checks were represented as payroll checks issued to defendant JEFFREY TOLL from "Sidewalksaver.com" on PNC accounts.

6. Between in and around August, 2000, and in and around January, 2001, a total of approximately \$51,645.73 in counterfeit PNC checks and checks written on fictitious PNC accounts were negotiated by defendant JEFFREY TOLL at Acme, Genuardi's and Superfresh grocery stores and presented for payment to PNC Bank.

7. Between in and around August, 2000 and in and around January, 2001, in the Eastern District of Pennsylvania and elsewhere, the defendant,

JEFFREY TOLL,

did knowingly make, utter and possess counterfeited securities of PNC Bank with the intent to deceive other persons and organizations operating in and affecting interstate commerce, that is, Acme, Superfresh and Genuardi's grocery stores.

In violation of Title 18, United States Code, Section 513(a).

PATRICK L. MEEHAN
United States Attorney